Data Sharing and Intellectual Capital Working Group – Regulatory Team Teleconference
November 1ˢᵗ, 2004, 2:00 P.M. EDT

MEETING MINUTES
Key Discussion Items
- Strawman Plan
- Immediate and long-term recommendation needs from DSIC
- Access and security rules
- Proposed short-term recommendation on security administration and access control

Attendees:
Howard Bilofsky
Elaine Brock
Don Connelly
Ed Quick
Amin Chisti
Phan Winter
Bob Robbins
Brian Gilman
Joyce Niland
 Wendy Patterson
Mike Becich
Absent:
Deborah Collyar
Mark Watson
David Fenstermacher
Mary Jo Deering
Michael S. O'Malley

Introduction

Howard opened the discussion by reviewing key points and highlights from our last DSIC group meeting. The outcome of that meeting was the establishment of independent parallel teams for the regulatory and proprietary topics.

The topic of soliciting use cases from the caBIG community was briefly discussed; a use cases / scenarios template is forthcoming

A list of topics for position papers needs to be developed. These papers would be drafted using the template sent from Phan.

Strawman Plan
The next item for discussion was the proposed plan drafted by Howard and distributed to the WG by Phan. However, not everyone had had a chance to review the document

before the meeting. It was given as an action item for everyone on the team to review the proposed plan thoroughly and provide comments by the next meeting

Howard commented on the overall goals listed in the Strawman Plan for this team: Goals range from raising awareness across the entire caBIG community to implementation of solutions.

Bob emphasized that we need to remind/inform other WS that compliance is not optional and that we (DSIC) need to interpret regulations and get recommendations to Architecture ASAP. He also mentioned a summary presented at the Architecture WS face-to-face meeting based on implementation use case examples, in which security was said to only apply to some workspaces and not all. Bob pointed out that security needed to be essential in all workspaces. Security and access controls need to be flexible enough that they can be implemented at very deep/detailed levels of access. He pointed out that this would help caBIG be proactive in preparing for future potential changes to security requirements rather than be reactive and re-coding/designing every time a legislative change occurs.

Immediate and long-term recommendations
Howard pointed out that there is a sense of urgency around getting some recommendations out to Architecture and the community.

Ed added that there might be two separate needs from the community of DSIC.
1. What we can do now to support compliant data sharing collaborations
2. What we need to plan on for the future.
He asked if the group can facilitate individual data use agreements now and also plan and make recommendations for future grid level security recommendations to the Architecture WS. He was not sure how fast Architecture could implement changes to accommodate security recommendations.

Bob mentioned that every access to service or data should require some level of authentication. And that conditional role-based look up to verify access should be implemented at many levels.
The question was raised concerning what level of access needed to be audited.

Howard asked if the Strawman Plan Goals met group approval.
Joyce commented that it would be hard to get IRB assurance from all participants.
It was pointed out that it would be important to monitor what IRBs are doing with regards to caBIG and attempt to get a common view of solutions that can be implemented across repeated scenarios. Wendy said that it would be good to funnel IRB issues that arise through this group.

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<u>Access and security rules</u>
Bob continued the discussion regarding levels of access defined by categories, using the example of a specific class of information from one source to another, and how that data must adhere to a specific rule set in compliance with appropriate IRBs, policies, regulations etc.

Howard asked if DSIC should be describing access rules to the caBIG community.
Elaine responded that this should be the focus for DSIC.
Howard mentioned that rules might be dependent on individual processes.
Wendy suggested that access rules should be defined in draft, then, based on application of rules to real use cases, the draft can be refined.

Elaine pointed out that data restrictions need to be flexible enough to handle many scenarios, offering examples of restriction by domain such as caBIG-only public data, and more strictly restricted access based on individual data use agreements.

Bob asked the group to consider how much responsibility for compliance should be on software layer vs. data layer. He further mentioned that the issue of global resolution of authentication is a big problem in the IT community.

Mike added that we should find workspaces with real issues, and that based on what he sees, there are three role-based rules:
-Clinical level access to internal data that is restricted to individual center or site
-Global sharing
-Honest broker level of access that maintains access control with a single node, facilitating the secure paring of restricted data with non-restricted data.

Howard reminded the group that they needed to raise awareness across the entire caBIG community, not just specific workspaces. Mike added that the rules governing the categories of data he described seemed pretty clear now, and asked if the group needs to create cross institute rules now based on those role-based rules.
There was a discussion of how we could go about this and, it was pointed out that there is a need for best practices based off of real time agreements that are occurring now, or in process, within caBIG.

Bob suggested that a good goal for implementation of security rules would be our ability to say that in 5 years, it should be trivially easy to add and change security, based on changing legislation. Howard added that access control should have the ability to be implemented grid-wide, as well as locally by participating groups in addition to the grid.

There was then some discussion about whether a Menu or Catalogue mechanism could be developed. With this mechanism, data resides locally within participating centers while

some form of meta data, or standard descriptors, or restrictions, are published to the grid. This way, potential collaborators could access and use this Menu or Catalogue to facilitate individual data use agreements with data owners. It was also pointed out that if restricted data were stored on the grid, it would have to have security parameters that were controllable or modifiable by the data owner in order to restrict and secure access.

The idea of a establishing a minimum level of security standards for institutions that participate in caBIG to agree to abide by was also mentioned.

Proposed Short-term recommendation
The group was reminded that this is a very time sensitive issue because if we do not give something to the Architecture group soon, they may build without consideration of our recommendations. Also, a simple recommendation is critical now for some groups needing to have answers in the near future, but the capability built by Architecture should be applicable to the entire caBIG community, if needed.

Wendy/Phan asked about next steps, as far as reporting or distributing our recommendations. It was decided that we would draft a concise recommendation for caBIG that could be discussed in the various working groups and workspaces, and then adopted.

Bob will take the first pass at a draft recommendation, and suggested that it include the following:
-Emphasize that regulatory compliance is not optional
-Access control and authentication rules must be very thorough in its application, and also be flexible
-Access control and authentication rules are subject to change
-Support for access and security implementation must be available to the entire grid, should it be needed
-Access control should also be through data so it would not require ongoing coding changes within various applications

Based on this short and conclusive statement, Howard suggested we use this statement as a request for use cases from the entire caBIG community, and that Liaisons should raise these issues and this statement within their groups.

Wendy/Phan discussed administrative issues
It was decided that the meeting schedule would be every two weeks at the same time. The next meeting will be Monday the 15ᵗʰ.

Ed offered a last point: The DSIC group needs to have recommendations for work that is happening now, in the absence of a model in place by the Architecture group.

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Mike emphasized that we should tie our future recommendations based on some example of developer/adopter parings that are going forward now. He suggested that we should ask groups that are moving forward now to work with us to document how they are meeting compliance. There was a suggestion of some specific parings between Pittsburg and Penn.

Phan said she could look up some of the active parings that we can approach to work with, and get an idea of how many of them already have issues around data sharing. Mike added that we should have a goal of rapid communications of best practices based on what we find with these early groups.

Action Items
Bob to draft concise recommendation and send to Phan/Wendy.

Phan will try to get consensus within the DSIC group rapidly so it can possibly be presented to the strategic planning group next week. If possible it will then be presented to Strategic planning group.

Mike, Mark, and Bob are planning to be at SPWG face-to-face meeting scheduled for November 8-9, and may be able to discuss it.

Next meeting is on Monday Nov. 15th 2pm EST. Don to take notes.

Phan will look for adopter/developer parings that have regulatory components that can be used for use cases.

Regulatory team members will review and provide feedback on Strawman Plan.

Liaisons will report recommendations to their groups.

Mike to draft first set of questions to example developer/adopter pairing mentioned in the meeting.